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 And NP Red Rock LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JOSHUA HUSOK,)	Case No.: 2:20-cv-01939-KJD-DJA
Plaintiff,)	
)	STIPULATION AND ORDER TO
vs.)	EXTEND SCHEDULING ORDER
)	DEADLINES
)	(Sixth Request)
STATION CASINOS, LLC, a Nevada)	
Limited Liability Company; NP RED)	
ROCK, LLC, d/b/a RED ROCK)	
CASINO, RESORT AND SPA, a)	
Nevada Limited Liability Company;)	
ROE Business Organizations I-X; and)	
DOE INDIVIDUALS I-X, Inclusive,)	
)	
Defendants.)	

The parties, by and through their respective counsel, hereby stipulate to extend the Scheduling Order deadlines in this case as follows:

Discovery Deadline	April 29, 2022
Dispositive Motion Deadline	May 31, 2022
Joint Pretrial Order	June 30, 2022 or 30 days from the ruling on a dispositive motion

This is the sixth request for an extension of these deadlines. The parties provide the following information regarding the proposed extension of the discovery deadline.

Discovery Completed to Date

The parties have served their Initial Disclosures and supplements thereto. Defendants have served interrogatories and requests for production and Plaintiff has responded. Plaintiff has served two sets of interrogatories and two sets of requests for production and Defendants have responded. Jennifer Johnson has been deposed. Rita Oliveri and Kiernia Jimenez-Milan were deposed June 28, 2021. Plaintiff was deposed on July 12, but his cross-examination was postponed because Plaintiff's counsel had a flare-up of a medical condition that caused the deposition to stop. Antonio Nunez was deposed September 13. Tia Campbell and Betty Martin were deposed September 15. Nyemma Demmons was deposed September 22. Erika Hernandez and Sammy Flores were deposed October 19. Stacy King was deposed October 21. Plaintiff's deposition was concluded on October 25. Elizabeth Alva and Guicela Alva were deposed January 10, 2022. The deposition of Zezy Farfan started on January 11, but it had to be postponed (as discussed below).

Remaining Discovery to Be Completed

Ms. Farfan, Michelle Cortes, Plaintiff's Rule 30(b)(6) deposition topics and possibly other limited discovery.

Reasons Discovery Could Not Be Completed Within the Existing Deadline

The Court may recall that the parties have agreed to consolidate discovery in this case with discovery in the somewhat related case of *Farfan v. Station Casinos LLC et. al.* (Case No. 2:20-cv-01516-JAD-NJK), which requires additional time to prepare for and take each deposition. In addition to the usual assortment of depositions, motions, hearings, mediations and appellate work in other cases, defense counsel was involved in a two-day arbitration which concluded on February 2. Plaintiff's counsel

continues to deal with ongoing health problems relating to herself and an elderly parent (as outlined in previous submissions to the Court).

Turning to specific case issues, Ms. Farfan, who is suing for disability discrimination in the related case and has mental challenges, had her deposition started on January 11, but it was stopped after a few questions because Plaintiff's counsel, defense counsel and the court reporter, to varying degrees, had difficulty understanding her. The parties have met and discussed, and continue to discuss, deposition protocols that will hopefully allow a meaningful deposition of Ms. Farfan to be taken. Also, the deposition of percipient witness, Michelle Cortes, has not been taken yet due to difficulties in locating her. Plaintiff's counsel has recently found a possible place of employment and Ms. Cortes will hopefully be served soon.

Proposed Dates for Completion of Discovery

The parties believe they will be able to complete discovery by the proposed new date of April 29, 2022.

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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

Dated: February 14, 2022